

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Civil Action No. 5:23-cv-630-FL

SONYA SHAW,)
)
)
Plaintiff,)
)
)
v.)
)
THE TOWN OF GARNER, RODNEY)
DICKERSON, in his individual)
capacity, MATT ROYLANCE, in his)
individual capacity, and B.D.)
SECHLER, in his individual capacity,)
)
)
Defendants.)

NOW COME the undersigned counsel on behalf of the Plaintiff and moves the Court pursuant to Fed. R. Civ. P. 6(b) and Local Civil Rule 6.1, to extend the time for responding to Defendants' Motion to Dismiss for 21 days. In support of this Motion, Plaintiff shows the Court the following:

1. The Complaint (DE01) in this matter was filed on October 30, 2023.
2. Defendants' unopposed Motion to Extend Time (DE17) to Plaintiff's Complaint was filed on November 17, 2023, and was granted.
3. On December 22, 2023, Defendants filed a Motion to Dismiss Plaintiff's Complaint (DE19).
4. On December 29, 2023, Defendants filed an amended Motion to Dismiss Plaintiff's Complaint (DE21).
5. The time for responding to Defendants' Motion to Dismiss has not expired.

6. Opposing Counsel have no objection to Plaintiff's Motion to Extend.
7. Good cause exists for this Motion to Extend due to Plaintiff's counsel's law firm's transition to a new practice management system which has taken up an unanticipated amount of time and prevented Plaintiff's counsel from finalizing the Memorandum in Opposition to the Motion to Dismiss.

WHEREFORE, Plaintiff respectfully requests an extension of the time of 21 days, or up to and including February 9, 2024, for the Plaintiff to respond to Defendants' Motion to Dismiss.

Respectfully submitted, this the 19th day of January, 2024.

/S/ VALERIE L. BATEMAN
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this **Motion** was filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record who have made an appearance in this matter.

This the 18th day of January, 2024.

S/ VALERIE L. BATEMAN
Valerie L. Bateman
NEW SOUTH LAW FIRM